

Application No. 09/694,975
Filed: October 24, 2000
TC Art Unit: 2643
Confirmation No.: 1367

REMARKS

Claims 1-2 and 25 have been cancelled; claims 3, 5, 7-8, 11-12, 14, 17 and 19-22 have been amended; and claims 26-31 has been added. Claims 3-24 and 26-31 are pending.

Independent claim 1 has been cancelled in favor of new independent claim 26, which more clearly sets forth the present invention. New claims 27-31 are directed to more specific classes of embodiments of the invention of claim 26.

The definitions of the "first" and "second" operating modes have been switched in new claim 26, and therefore several claims have been amended to reflect this change.

In the Office Action, claims 14-15 were rejected under 35 U.S.C. § 112 as being non-enabled, based on an apparent interpretation that the message-retrieval function of claim 14 is being performed when the keyboard is already handling another call. However, it is respectfully submitted that such an interpretation of claim 14 is erroneous. Claim 14 requires only that the function be performed when the keyboard is in the first operating mode. However, the first operating mode (as previously defined in claim 2 and now in claim 26) involves only the sending of alphanumeric character code signals on the telephone line, as opposed to the sending of telephone dialing signals that occurs in

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the second operating mode. There is no requirement for a local telephone device at all, and certainly no requirement for a local telephone device that is off-hook. While such configurations are specified in later claims, i.e. claim 3, they are not incorporated into claim 14 either directly or by reference. In claim 14, for example, it is assumed that the "off-hook" condition has been generated by the keyboard itself, functioning as an answering machine delivering a message over the telephone line. Hence, it is submitted that claims 14 and 15 as currently written are enabled by the present specification and therefore are acceptable under 35 U.S.C. § 112.

In the Office Action, claims 1-25 are rejected as being either anticipated or rendered obvious by Kessler, U.S. 4,503,288. This rejection is now moot due to the cancellation of claim 1.

The following remarks are presented to assist the Examiner in differentiating new claims 26-31 from the art of record including Kessler.

Claim 26 recites an alphanumeric keyboard in which each key is uniquely associated with an alphanumeric character from a set of alphanumeric characters which includes at least a plurality of letter characters. A common example is a so-called QWERTY keyboard, in which each key is associated with different letter or

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number from the set of 26 English letters and 10 decimal numbers. Each alphanumeric character is representable as data by an alphanumeric code signal from a set of alphanumeric code signals (e.g., the ASCII character code set). Each alphanumeric character is also representable as a component of a telephone number by a telephone number dialing signal from a set of telephone number dialing signals in accordance with a mapping. An example includes the following well-known standard mapping used in North America, which is specifically recited in new dependent claim 31:

{A,B,C} -> 2

{D,E,F} -> 3

etc.

The keyboard is operative in response to the pressing of a key for a given alphanumeric character (1) in a first operating mode, to generate the alphanumeric code signal to which the given alphanumeric character is mapped, and (2) in a second operating mode, to generate the telephone number dialing signal to which the given alphanumeric character is mapped.

Kessler shows an "intelligent telephone" device having a QWERTY keyboard. It appears that the device can be used as a data terminal which generates ASCII code signals on an attached

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telephone line. It also appears, based on the description beginning at column 2, line 49, that the device can be operated in a "typical Ma-Bell telephone operating mode". Additionally, a user is able to form a "numeric pad" having an "adding machine" layout, such that the numbers 7, 8 and 9 replace the letters T, Y and U; 4, 5 and 6 replace G, H and J; 1, 2 and 3 replace B, N and M; and a return and 0 replace two halves of a space bar.

Kessler does not describe the use of the "adding machine" numeric pad in the "Ma-bell operating mode", i.e., to dial telephone numbers. Nowhere does Kessler explicitly state any such use of the numeric pad. It is noted that the numbers 1, 2, ... 9 in a standard adding machine layout proceed from lower left to upper right, whereas on a telephone keypad they proceed from upper left to lower right. Additionally, there is no role for a "return" key in dialing telephone numbers, although the return key does have a role in an adding machine. Thus, Kessler describes a keyboard that (1) can apparently somehow be used to dial telephone numbers (but left unspecified), and (2) includes a numeric pad portion that can be used to enter numeric data in the same manner as on an adding machine. Neither of these amounts to using the numeric pad to dial telephone numbers.

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Moreover, even if it were assumed that Kessler's numeric pad can be used to dial telephone numbers, it appears that Kessler would suggest only that the dialing signal #7 is generated on the telephone line when the "7" key of this numeric keypad is pressed, signal #8 is generated when the "8" key is pressed, etc. There is no disclosure in Kessler of a keyboard that is operative in response to the pressing of a key for a given letter character to generate a telephone number dialing signal to which the letter character is mapped according to a mapping. Although the "7" key on Kessler's numeric keypad is in the same location as the "T" key, this does not amount to a mapping of letter characters to telephone number dialing signals. Indeed, in describing the numeric pad formation, Kessler states that the numbers "replace" the letters, and the letters "become" the numbers. The "T" key is really replaced by the "7" key - it no longer functions as a "T" key for any purpose. Furthermore, nowhere does Kessler indicate that the newly formed numbers can "dial" the erstwhile letters, i.e., that the numeric pad be used in conjunction with a mapping of the letters {T,Y,U,G,H,J,B,N,M} to dial telephone numbers expressed using only such letters. In fact, one could envision placing a template over these keys when the device is being used for dialing, in which case the letters associated with the keys

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would not even be identifiable to a user. Thus, any association between telephone dialing signals and letters in Kessler is completely incidental and does not amount to a mapping.

Thus, based on the foregoing, it is respectfully urged that Kessler does not teach or suggest an alphanumeric keyboard that places one of two sets of signals on a telephone line for each of alphanumeric characters (including letter characters) appearing on a keyboard - alphanumeric character code signals to represent the alphanumeric character as data (in a first operating mode), and a telephone dialing signal in accordance with a mapping to represent the alphanumeric character as a component of a telephone number (in a second operating mode). Rather, Kessler shows only that certain letter keys can be replaced by a set of numeric keys, not for purposes of dialing and not employing any mapping of letter characters to telephone dialing signals. Accordingly, claim 26 is believed to be patentable notwithstanding the teaching of Kessler and the other art of record. Because the remaining claims are all dependent from claim 26, these claims are likewise seen to be patentable.

Based on the foregoing, it is believed that all the claims of this application are presently allowable. Favorable action is respectfully requested. The Examiner is encouraged to telephone

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the undersigned attorney to discuss any matter that would expedite allowance of the present application.

Respectfully submitted,

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